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*Attorneys for Plaintiffs,*  
Joanna Ardalan, Esq. and One LLP

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JOANNA ARDALAN, ESQ, an  
individual; ONE LLP, a California  
Limited Liability Partnership,

Plaintiff,

v.

BINOTECH LLC,; KAREN  
MUMMERT; MICHAEL MUMMERT;  
ABDULLAH LIMITED COMPANY,  
CODERS CUBE LLC, HIK TECH  
LLC, DATA PATCH, INC., DOE 1,  
d.b.a LAW INTEGRAL, LLC, business  
entity unknown; DOE 2, d.b.a DEPUTY  
TRADEMARK. business entity  
unknown; DOE 3, p.k.a MICHELLE  
SPRAGUE, an individual; DOE 4, d.b.a  
TRADEMARK INTEGRAL, business  
entity unknown; DOE 5, d.b.a  
BRANDREGISTRATION.ORG,  
business entity unknown; and DOES 6  
through 10, inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-(DFMx)  
Hon. Kenly Kiya Kato

**DECLARATION OF JOANNA  
ARDALAN IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS ABABDULLAH  
LIMITED COMPANY, BINOTECH  
LLC, AND HIK TECH LLC'S  
MOTION TO SET ASIDE  
DEFAULT**

**DECLARATION OF JOANNA ARDALAN**

I, Joanna Ardalan, declare as follows:

1. I am an attorney at law duly licensed to practice in this court and am a party in this action. I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify thereto.

2. Attached as **Exhibit A** is a true and correct copy of email correspondence between Hamza Khan and me. Mr. Khan holds himself out as the owner and founder of Binotech LLC and Hik Tech LLC. I spoke with Hamza Khan telephonically on or around August 8, 2024, as acknowledged in Exhibit A, and he represented he took the Binotech website down.

3. Attached as **Exhibit B** is a true and correct copy of email correspondence between Hamza Khan and me.

4. Attached as **Exhibit C** is a true and correct copy of email correspondence between Hamza Khan, Abdullah Khan, and me.

5. I had a Zoom call with Hamza Khan and Abdullah Khan on September 24, 2024. They agreed to have the video call recorded. Neither they nor their counsel ever asked me for a copy of the call.

6. Attached as **Exhibit D-1** is a true and correct copy of an invoice the Khans sent me which they contend evidences payment for the creation of the website. It was sent to me as PDF file. Attached as **Exhibit D-2** is a screenshot of the metadata for that file that shows it was created the same day it was sent to me.

7. Attached as **Exhibit E-1** is a true and correct copy of an invoice the Khans sent me which they contend evidences payment for the creation of the website. It was sent to me as PDF file. Attached as **Exhibit E-2** is a screenshot of the metadata for that file that shows it was created the same day it was sent to me.

1           8.       Attached as **Exhibit F** is a true and correct screen capture I took of the  
2 Binotech website on or around May 20, 2024, which uses the phone number 415-  
3 707-7196.

4           9.       Attached as **Exhibit G** is a true and correct screen capture I took of the  
5 Binotech website on or around July 12, 2024, which uses the phone number 213-  
6 641-0900.

7           10.      Attached as **Exhibit H** is a true and correct copy of excerpts of a  
8 transcript of the video call.

9           11.      The Khans and I never discussed settlement. The Khans wanted to offer  
10 information to convince me that they were not involved and I followed up on that  
11 offer. As discussed in the email messages attached hereto and the Zoom call  
12 transcript, they did not provide the information they said they would and have taken  
13 inconsistent positions about whether the documents exist.

14  
15           I declare under penalty of perjury that the foregoing is true and correct.  
16 Executed this 19 day of December 2024, in Los Angeles, California.

17                               /s/Joanna Ardalan

18                               Joanna Ardalan

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